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 Darren Uyenyoyama*

[Additional Counsel Listed On Signature Page]

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION**

**Cung Le, Nathan Quarry, Jon Fitch, on behalf of
 themselves and all others similarly situated,**

Plaintiffs,

v.

**Zuffa, LLC, d/b/a Ultimate Fighting
 Championship and UFC,**

Defendant.

**Case No. 5:14-cv-05484-EJD
 5:14-cv-05591-EJD
 5:14-cv-05621-EJD
 5:15-cv-00521-EJD
 5:15-cv-01324-PSG**

**ADMINISTRATIVE MOTION TO
 CONSIDER WHETHER CASES
 SHOULD BE RELATED PURSUANT
 TO CIVIL L. R. 3-12 AND 7-11**

5:14-cv-05484-EJD, 5:14-cv-05591-EJD,
 5:14-cv-05621-EJD, 5:15-cv-00521-EJD,
 5:15-cv-01324-PSG

**Luis Javier Vazquez and Dennis Lloyd Hallman,
on behalf of themselves and all others similarly
situated,**

Plaintiffs,

v.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

**Brandon Vera and Pablo Garza, on behalf of
themselves and all others similarly situated,**

Plaintiffs,

v.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

**Gabe Ruediger and Mac Danzig, on behalf of
themselves and all others similarly situated,**

Plaintiffs,

v.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

**Kyle Kingsbury and Darren Uyenoyama, on
behalf of
themselves and all others similarly situated,**

Plaintiffs,

v.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that, pursuant to Civil Local Rules 3-12 and 7-11, Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez, Dennis Lloyd Hallman, Brandon Vera, Pablo Garza, Gabe Ruediger, Mac Danzig, Kyle Kingsbury and Darren Uyenoyama (collectively, “Plaintiffs”) submit this administrative motion requesting the Court to consider whether *Kingsbury et al v. Zuffa, LLC*, Case No. 5:15-cv-01324-PSG (the “*Kingsbury* Action”), filed in this District on March 20, 2015, should be related to the instant and first filed action, *Le et al. v. Zuffa LLC*, Case No. 5:14-cv-05484-EJD (the “*Le* action”), filed December 16, 2014.¹

Civil Local Rule 3-12(a) provides that actions are related when (1) the actions concern substantially the same parties, property, transaction or event; and (2) it appears likely that there will be an unduly burdensome duplication of labor and expense or conflicting results if the cases are conducted before different judges.

The *Kingsbury* Action should be related to the instant action because these actions together readily meet the criteria for relation set forth above. Indeed, no substantive difference exists between the allegations and claims for relief in the *Kingsbury* Action and in the instant action. The *Kingsbury* Action alleges facts and asserts claims involving the same scheme of anticompetitive behavior as that alleged in the *Le* Action. As in the instant case, the *Kingsbury* plaintiffs have filed suit to seek recovery on behalf of two classes: (1) “Bout Plaintiffs”—Elite Professional Mixed Martial Arts (“MMA”) Fighters who fought in at least one bout promoted by defendant Zuffa²; and (2) “Identity Plaintiffs”—Elite Professional MMA Fighters whose Identity was expropriated or exploited by Zuffa. Identically to the *Le* plaintiffs, Plaintiffs Kingsbury and Uyenoyama seek class damages and injunctive relief for monopolization under Section 2 of the Sherman Act, 15 U.S.C. § 2. Like the *Le* Plaintiffs, Kingsbury and Uyenoyama allege a class period running from December 16, 2010 to the present.

¹ This Court has already related three other cases to the *Le* case: Vazquez et al. v. Zuff, LLC, No. 5:14-cv-05591-EJD; Vera et al. v. Zuffa.LLC, No. 5:14-cv-05621; and, Ruediger et al. v. Zuffa, LLC, No. 5:15-cv-00521-EJD. These three cases, like *Kingsbury*, involve the same class period, material allegations, relief sought and Defendant.

² “Zuffa” refers to Zuffa, LLC and its registered trademarks Ultimate Fighting Championship® and UFC®.

1 The class period, the material allegations, the relief sought, and the defendant are the same in the
 2 two cases. As such, these two cases will require adjudication of the same questions of law and fact.
 3 Relation of the *Kingsbury* Action to the first-filed *Le* Action therefore will promote the conservation of
 4 judicial and party resources in these cases and will ensure efficiency in their prosecution and final
 5 disposition. On the other hand, were the *Kingsbury* Action to proceed separately from the *Le* Action, the
 6 Court and the parties would experience unduly burdensome duplication of labor and expenses and would
 7 face the possibility of conflicting results.

8 Therefore, Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez, Dennis Lloyd
 9 Hallman, Brandon Vera, Pablo Garza, Gabe Ruediger, Mac Danzig, Kyle Kingsbury and Darren
 10 Uyenoyama respectfully request that the Court relate the *Kingsbury* Action to the *Le* Action.

11 Dated: March 23, 2015

JOSEPH SAVERI LAW FIRM, INC.

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